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MEMO ENDORSED

at page 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
STEVEN RODRIGUEZ, :
 : NOTICE OF
 : FOR ATTORNEYS FEES
 :
 : Plaintiff, : PURSUANT TO
 : 28 U.S.C. § 2412
 :
 :
 : -against- : 1:23 Civ. 10764 (ER) (VF)
 :
 :
 : MARTIN J. O'MALLEY, :
 : COMMISSIONER OF SOCIAL SECURITY, :
 :
 : Defendant. :
-----X

PLEASE TAKE NOTICE that upon the accompanying Declaration of Christopher James Bowes, dated August 19, 2024, plaintiff will move this Court before Honorable Edgardo Ramos, United States District Court Judge presiding, at the United States Courthouse, Southern District of New York, 40 Foley Square, New York, new York 10007, on submission, for an order, on submission, for an order:

(1) Accepting plaintiff's application for reasonable attorney's fees and costs pursuant to the Equal Access to Justice Act ("EAJA"), 28 U.S.C. §2412(d), as timely filed; and

(2) Granting plaintiff leave to defer filing a memorandum of law in support of her application for fees for a period of 60

days to permit the parties an opportunity to reach settlement of the fee issue; and

(3) for such other and further relief as this Court may deem just and proper.


Dated: Shoreham, New York
August 19, 2024

Respectfully submitted,

/s/Christopher James Bowes
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To: Jonathan King, Esq.
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Attorneys for Defendant

Plaintiff's application for attorney fees and costs is accepted for filing. Plaintiff's request for leave to defer filing a memorandum of law in support of her application until October 18, 2024 is granted. The motion remains pending. SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: August 20, 2024
New York, New York